

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.) Crim. No. 04-10219-JLT
)
EMMANUEL LEE)

MOTION FOR INTERIM FUNDS FOR EXPERT TO RE-WEIGH DRUGS

Now Comes defendant Emmanuel Lee, who respectfully moves this Court to grant defendant two thousand (\$2000.00) dollars to retain Dr. Harvey Cohen to re-weigh and inspect the drugs in this case. Defendant also seeks an order permitting Dr. Cohen to be paid on interim basis. This Court has already issued an order permitting Dr. Cohen access to the drugs for this purpose. His curriculum vitae has been provided to the court and government in past motions. These funds are requested for the following reasons:

1. Dr. Cohen charges \$250.00 an hour for these services.
2. As it is expected that the weighing can occur in Massachusetts, the \$2000.00 request would cover up to a full day of services by Dr. Cohen. If the drugs are transferred to New York City, then defendant may need to request additional funding for Dr. Cohen to perform his duties in NY.

Wherefore, defendant moves this Court to grant his motion for funds as described above.

Submitted By
Emanuel Lee's Attorney

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AFFIDAVIT OF COUNSEL

I, James Budreau, do state that the following is true to the best of my knowledge:

1. I was appointed as counsel for Emanuel Lee in the above referenced case.

2. I have spoken to Dr. Harvey Cohen and he has provided me with the rates contained in the motion. I have previously appended his curriculum vitae to past motions.

Signed under pains and penalties of perjury,

James Budreau /S/
JAMES BUDREAU